

CODE OF ETHICS

The NEURO Medical Centre Code of Ethics (hereafter referred to as the "**Code**") aims to shape appropriate practices and employee relations to conduct open, honest and competitive business, while responsibly building business strategy, running day-to-day operations and sustainable development. We recognise that the following practices - applied to our day-to-day operations by establishing rules for a friendly, open working atmosphere and mutual respect - will contribute to improving our work culture and ensuring long-term and mutually beneficial relationships based on mutual respect, openness and trustworthiness with our employees, colleagues and representatives.

The Code is an important part of our sustainability policy and aims to build brand trust and positively influence the culture and work ethos of the organisation. The introduction of the Code is also intended to contribute to the materialisation of the ideas guiding the founders of NEURO Medical Centre, aimed at the development of evidence-based medicine (EBD)

The clinic supports the Universal Declaration of Human Rights, the conventions of the International Labour Organisation and applies the 10 principles covering the following areas:

- a) human rights,
- b) labour law,
- c) environmental protection,
- d) anti-corruption measures.

The Medical Centre respects working standards based on EBM (evidence-based medicine) - the use of reliable scientific evidence for the efficacy and safety of therapies in clinical proceedings.

GENERAL PRINCIPLES

§ 1

1. The Code of Ethics of the employees of the NEURO Medical Centre (hereinafter referred to as the "**Medical Centre**") constitutes a set of values and principles to be followed by the employees and collaborators of the Medical Centre in the performance of their professional tasks in the workplace and outside it.
2. In connection with the provisions contained in the Preamble, Medical Planet Sp. z o.o. requires its employees, co-workers and representatives to comply with the principles and provisions contained not only in the Labour Code, the employment contract, the organisational regulations and other acts in force at the Medical Centre, but also those arising from this Code.
3. The recommendations contained in the Code should be adhered to both by persons employed at the Medical Centre on the basis of an employment contract and by persons providing services on the basis of civil law contracts.

4. All employees, associates and representatives of the Medical Centre have been informed of the requirements placed on them under this Code.
5. The Medical Centre will support its employees, associates and representatives in complying with this Code where necessary, but appropriate consequences will be taken in the event of persistent non-compliance.
6. The purpose of the Code is to support employees in meeting standards of ethical conduct, to improve the quality of the services and benefits provided at the Medical Centre and to increase the confidence of patients and their families in qualified medical and therapeutic staff.
7. Employees and associates of the Medical Centre are aware that their business is to protect health, understood as the paramount welfare of each patient.
8. This Code supports and promotes the conduct of employees based on values and principles: respect, dignity, responsibility, honesty.
9. Employees shall carry out their duties in a manner that does not raise ethical concerns and increases the confidence of patients using services at the Medical Centre and their families, and shall engage in the development of their own competence and knowledge in order to do their work to the best of their ability.
10. All employees shall make a declaration that they have read the Code of Ethics as soon as it comes into force. They also fulfil this obligation by signing the content of this Code of Ethics. The statements shall be attached to the employee file.
11. A newly hired employee shall submit a statement on familiarisation with the Code of Ethics immediately after the conclusion of the employment contract. The statement shall be attached to the employee file.

PRINCIPLES OF ETHICAL BEHAVIOUR TOWARDS PATIENTS AND THEIR FAMILIES

§2

1. Employees of the Medical Centre shall act in accordance with the rule of law, apply in their professional activity procedures arising from generally applicable laws, internal regulations of the Medical Centre, EBM guidelines.
2. Employees shall perform their work, always bearing in mind the respect and dignity of patients and their families and colleagues, using their knowledge and skills to the maximum extent.
3. When providing a particular medical and/or therapeutic service, employees, in accordance with their professional competence under separate regulations, are obliged to provide the patient and the person authorised by the patient with comprehensive information which may affect the patient's decision and consent to the proposed medical or therapeutic procedure.

4. In their direct contacts with the patient and the patient's family, the staff of the Medical Centre shall be guided by tact, courtesy, high personal culture and, above all, by kindness and care to provide appropriate and reliable service to the patient, trying to help him/her to recover quickly.
5. Staff shall respect the patient's right to intimacy and personal dignity.
6. Staff shall show due respect to the patient and shall not abuse the patient's trust.
7. Staff shall respect the rights of the patient primarily on the basis of the Patients' Rights and Patients' Ombudsman Act and other legislation.
8. Staff inform patients and family members of their rights and obligations of patients using the Medical Centre's services with culture and patience.
9. Employees shall use information obtained or acquired as a result of their duties only for official purposes and, with regard to patients' rights, shall disclose such information only when circumstances so require and in accordance with the law.
10. Employees of the Medical Centre shall not personally receive any remuneration for their activities or demand any material expression of gratitude from the patient or his family, subject to the provisions of § 6 of the Code.
11. Employees of the Medical Centre may use their powers only to achieve the purposes for which those powers have been conferred on them.
12. Employees of the Medical Centre shall not use their powers to achieve purposes for which there is no legal basis or which cannot be justified in the interests of the patient or the public interest.
13. In dealing with requests and in making decisions, the staff of the Medical Centre shall ensure that the principle of equal treatment of all persons, including in particular patients, is respected. All patients in the same situation shall be treated in a comparable manner.
14. Employees of the Medical Centre shall refrain from any unjustified and unequal treatment of patients on the basis of their nationality, sex, race, colour, ethnic or social origin, genetic features, language, religion or belief, political or other convictions, membership of a national minority, ownership of property, birth, disability, age or sexual preference.
15. Employees of the Medical Centre, while respecting the differences that characterise patients, are always guided by the principle of equal treatment and equal opportunities and respect for patient rights, including in particular the right to free access to health services within the Medical Centre's capacity.
16. In the course of making decisions towards patients, the employees of the Medical Centre ensure that the actions adopted are commensurate with the objective pursued, in accordance with the regulations and procedures in force at the Medical Centre.

PRINCIPLES OF ETHICAL BEHAVIOUR TOWARDS COLLEAGUES

§ 3

1. Employees shall be collegial and non-conflictual towards colleagues (colleagues).
2. Employees by their loyal personal, professional and social attitude should care for the prestige of the profession and the Medical Centre.
3. The performance of managerial duties should be accompanied by a sense of responsibility for the professional development of subordinates and the Medical Centre.
4. Employees should pass on to their younger colleagues their professional knowledge and skills, as well as the cultural models and principles of respect for human beings that are generally recognised as good.
5. Employees should refrain from unfair rivalry, relate respectfully to their superiors and subordinates.
6. Employees shall not reproduce unverified and heard information about colleagues.
7. Employees shall cooperate comprehensively and responsibly with other employees to perform their professional duties and strive to improve the operation of the Medical Centre and improve the efficiency of the activities undertaken.
8. Employees should keep confidential any information obtained in the course of their work activities.
9. Employees should comply with and be guided by the Code of Ethics.

CONFIDENTIALITY AND PROTECTION OF PERSONAL DATA

§ 4

1. The employees, associates and representatives of the Medical Centre shall be guided in their work by transparent and clear principles and rules and shall communicate to their immediate superiors any kind of information that may be relevant to the performance of the Medical Centre and the sustainability of the Medical Centre.
2. In order to maintain the highest standard of confidentiality, employees, associates and representatives of the Medical Centre will not pass on business, commercial or financial information obtained from a client or supplier of the Medical Centre to third parties. This applies in particular to financial and technical data, plans, business projects, payroll, analyses, reports, extracts,

summaries, executive summaries, as well as excerpts from the aforementioned confidential documents.

3. Employees, associates and representatives of the Medical Centre, in order to protect personal data, are obliged to comply with all the rules arising from Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons in relation to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation) and the Information Security Policy applied at the Medical Centre.
4. In the event that confidential information or personal data concerning the Medical Centre or a patient comes into the possession of a third party, an employee, collaborator or representative of Medical Planet Sp. z o.o. shall immediately inform their immediate superior and take appropriate steps to protect the confidential information or personal data from further dissemination.

CONFLICT OF INTEREST

§ 5

1. A conflict of interest occurs when an employee, associate or representative of the Medical Centre or a person related to him or her is employed by or has a material interest in any enterprise (subsidiary, company, corporation) competing with the Medical Centre or connected with the Medical Centre by any contract concerning the provision of services or service or other activities.
2. An employee, associate or representative of the Medical Centre undertakes to notify the Medical Centre if a conflict of interest arises.

PROCEDURE FOR ACCEPTANCE OF GIFTS

§ 6

1. It is not permissible to accept or give gifts or to accept or make promises which could in any way influence the objective assessment of a contractor, partner, supplier or patient and, consequently, influence the employee and the reliability of his/her performance.
2. It is permitted to give and accept only:
 - (a) small gifts customary in the circumstances of a given type of a value not exceeding PLN 200 or items bearing the donor's logo of a value not exceeding PLN 200;
 - (b) the acceptance or giving of a gift does not occur more often than once every 3 months.
3. Giving or receiving a gift with a value exceeding PLN 200 and not exceeding PLN 2,000 is permitted only if all of the following conditions are met:
 - (c) the giving or receiving of the gift has been reported to and approved by the immediate

supervisor;

- (d) the gift is given or accepted after the performance of the contract and, in the case of permanent relationships with contractors, partners, suppliers or patients, after at least one year of cooperation and no more often than once a year;
 - (e) the giving or acceptance of the gift is reported to the Ethics Committee.
4. Accepting or offering a gift with a value exceeding PLN 2,000 requires meeting the requirements described in pt. 3 above and obtaining a positive opinion of the Ethics Committee and the approval of the Management Board of Medical Planet Sp. z o.o.
 5. Only courtesy gifts (up to PLN 50 in value) may be given to state or local government officials or legislative bodies, and only after a matter has been settled or proceedings concluded.
 6. Cash or its equivalent (e.g. a voucher), regardless of value, may not be accepted or given under any circumstances.

MONITORING COMPLIANCE WITH THE CODE OF CONDUCT

§ 7

1. The employees, associates and representatives of the Medical Centre undertake to comply at all times with all the provisions of this Code and with the principles of sustainability and social responsibility.
2. The Medical Centre reserves the right to verify compliance with this Code and the results of actions taken by its employees, collaborators and representatives. To this end, the Medical Centre will have the right to carry out periodic inspections by the immediate supervisor of the employee, collaborator or representative of the Medical Centre. Employees, co-workers and representatives of the Medical Centre are obliged to cooperate during the inspection and to provide any information required during the inspection.
3. In the event that an employee, co-worker or representative of the Medical Centre fails to comply with any of the provisions of this Code and irregularities are revealed during the inspection, the Medical Centre shall set a deadline for correcting the actions contrary to the principles of this Code.
4. The Medical Centre shall provide all assistance and advice to its employees, co-workers and representatives on the actions to be taken to remedy any irregularities in compliance with this Code.
5. If, after the expiry of the time limit set out in point 4 above, no action is taken to remedy the irregularities, the Medical Centre may take appropriate action as provided for in the Labour Law.

6. If gross violations of the rules under this Code (including violations of any of the provisions of this Code with respect to conduct in accordance with the law, safety, employment rules, human rights and ethical conduct) are revealed during an inspection, the Medical Centre may, at its discretion, either set a time limit for rectification of the irregularities or take the actions provided for in the labour law.

FINAL PROVISIONS

§ 8

1. The Medical Centre and its employees, associates and representatives shall ensure that they in their dealings with each other, they will maintain the principles of mutual communication and inform the other party of any kind of violations and irregularities in the observance of the principles of this Code. The communication of irregularities in the observance of the principles of this Code will not affect further cooperation between the Medical Centre and its employees, collaborators and representatives.
2. The Code has been accepted and approved by the competent representation of Medical Planet Sp. z o.o. in accordance with the entries in the register of entrepreneurs.
3. Amendments to the Code and its Appendices must be made in writing.
4. Any amendments to the Code or its Annexes, the employees, co-workers and representatives of the Medical Centre shall be promptly informed in the manner adopted by the Medical Centre.

Warsaw, 31 May 2021